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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,  
14 v.  
15 SALVADOR LOPEZ-PULIDO,  
16 Defendant.

Case No. 2:19-cr-168-RFB-VCF

**STIPULATION TO CONTINUE  
PRETRIAL MOTION DEADLINES**  
(First Request)

17  
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
19 Trutanich, United States Attorney, and Jared Grimmer, Assistant United States Attorney,  
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
21 and Katherine Tanaka, Assistant Federal Public Defender, counsel for Salvador Lopez-Pulido,  
22 that the previously ordered deadline for filing of pretrial motions be vacated and that the parties  
23 herein shall have to and including September 9, 2019, within which to file the Defendant's  
24 pretrial motions currently due August 9, 2019.

25 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
26 shall have to and including September 23, 2019, to file any and all responsive pleadings,  
currently due August 23, 2019.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including September 30, 2019, to file any and all replies to dispositive motions,  
3 currently due August 30, 2019.

4 The Stipulation is entered into for the following reasons:

- 5 1. Counsel for the defendant needs additional time to review discovery and  
6 consider pretrial motions.
- 7 2. The defendant is incarcerated and does not object to the continuance.
- 8 3. The parties agree to the continuance.
- 9 4. Additionally, denial of this request for continuance could result in a miscarriage  
10 of justice.

11 This is the first stipulation to continue filed herein.

12 DATED this 7<sup>th</sup> day of August, 2019.

13 RENE L. VALLADARES  
14 Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

15 */s/ Katherine Tanaka*  
16 By \_\_\_\_\_

17 KATHERINE TANAKA  
Assistant Federal Public Defender

*/s/ Jared Grimmer*  
By \_\_\_\_\_

JARED GRIMMER  
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 SALVADOR LOPEZ-PULIDO,

7 Defendant.

Case No. 2:19-cr-168-RFB-VCF

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

9  
10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

13 1. Counsel for the defendant needs additional time to review discovery and  
14 consider pretrial motions.

15 2. The defendant is incarcerated and does not object to the continuance.

16 3. The parties agree to the continuance.

17 4. Additionally, denial of this request for continuance could result in a miscarriage  
18 of justice.

**ORDER**

IT IS THEREFORE ORDERED that the parties herein shall have to and including September 9, 2019, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including September 23, 2019 to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including September 30, 2019 to file any and all replies to dispositive motions.

DATED this 8th day of August, 2019.



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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE